Before the Federal Communications Commission Washington, D.C. 20554

RECEIVED

AUG 1 3 1992

MM Docket No. 92-6

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

In re Applications of

NORMANDY BROADCASTING CORP. File No. BRH -910129UR

ORIGINAL FILE

For Renewal of License of Station WYLR(FM) (95.9 Mhz) Glens Falls, New York

and

LAWRENCE N. BRANDT

For a Construction Permit for a new FM Station on 95.9 Mhz at Glens Falls, New York

File No. BPH-910430MB

To: Administrative Law Judge

Richard L. Sippel

DIRECT CASE/PROFFER OF EVIDENCE OF NORMANDY BROADCASTING CORPORATION

DIRECT EXHIBIT #	DIRECT EXHIBIT # SUBJECT	
		e de la companya de
1	CORPORATE STRUCTURE	CHRISTOPHER P. LYNCH
1 2	MANAGEMENT	CHRISTOPHER P. LYNCH
3	CHRISTOPHER P. LYNCH INTEGRATION	CHRISTOPHER P. LYNCH
4	DIVERSIFICATION	CHRISTOPHER P. LYNCH
5	AUXILIARY GENERATOR	CHRISTOPHER P. LYNCH
6	PROGRAMMING EXHIBIT	CHRISTOPHER P. LYNCH
7	SWORN AFFIDAVIT TO PRESSURES MITIGATING AND/OR EXCULPATING ERRORS	CHRISTOPHER P. LYNCH
8	STATEMENTS AS TO ATTEND- ANCE AND EFFORTS TO UP- GRADE COMPLIANCE	CHRISTOPHER P. LYNCH
9	CHARACTER AND WYLR PERFORMANCE TESTIMONIALS	CHRISTOPHER P. LYNCH
10	LETTERS AND AWARDS TO WYLR OR IT'S PERSONNEL/MANAGE- MENT ON ITS BEHALE	CHRISTOPHER P. LYNCH

I also can attest to WYLR's involvement in the following miscellaneous items listed in Normady's proffer: the Miller Christmas Wreath program for C.P.; Scholar Appreciation week; the Angela Williams benefit; Hometown USA Adopts a Town; Shamrock Shuffle; Glens Falls Sesquicentennial observance; Bloodmobiles; Job Discovery; Walkamerica; Drug-free graduation party; Fort Edward Christmas Decoration fund drive; Earth Day rally; and the New York Olympic Run.

Because of WYLR's format and listenership, most public service and community affairs issues were covered through short announcements and live broadcasts. This was deemed the most effective way to get the message to our listeners.

In the six years I've been employed by Normandy Broadcasting, both WWSC & WYLR have done more community service than any other local radio station. It is my opinion that Mr. Lynch will continue to operate WWSC & WYLR in the best interests of the community.

7/10/92

CORPORATE STRUCTURE

Normandy Broadcasting Company ("Normandy") is a New York corporation whose stock is 100% owned by Christopher P. Lynch.

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Docket No. 12	Exhibit No.
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Reporter Date 25	

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MANAGEMENT

Christopher P. Lynch will continue to devote forty (40) hours or more per week to the operation of WYLR and Normandy Broadcasting as its General Manager. Mr. Lynch will spread his time at the Station over at least a Monday-Friday workweek. As General Manager. Mr. Lynch will continue to exercise general supervision and hold ultimate authority over all aspects of station management and operation. In particular, he will continue to oversee construction and regulatory compliance, hire and supervise the staff (including department heads), and deal with advertisers and their representatives. Mr. Lynch will supervise the Station's format and implement it through appropriate programming. Mr. Lynch will also continue to hire the Station's local and communications counsel, accountants and consulting engineers. He will continue to fix operating budgets and coordinate banking arrangements.

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INTEGRATION OF CHRISTOPHER P. LYNCH

- 1. Christopher P. Lynch is a forty-three year old male who has lived within the service area of WYLR and WWSC for thirty-one years, within Queensbury, NY from 1960 to 1972, and from 1987 to present, (except for military service), and in West Fort Ann from 1972 to 1987. He bought land in Queensbury in 1975, and in 1987 built a home there; since 1987 he has lived there, together with his wife and adopted son. He will continue to live at his present residence following a renewal.
- Mr. Lynch was born in Stockholm, Sweden, on June 22, 1948. He is an American citizen. Mr. Lynch attended school in downstate and upstate New York, including Queensbury. After a year and a half of college (Adirondack Community College and Rutgers), Mr. Lynch voluntarily enlisted in the United States Army in 1967, and was trained in combat communications. Mr. Lynch graduated from basic training at Fort Dix, New Jersey, with honors and a promotion (also at Fort Dix, New Jersey) and went to Fort Goradon, Georgia for specialized communications training, where he again received honors and a promotion, achieving the rank of Specialist, Echelon 4. He was trained in radio relay, telecommunications, general set up, maintenance and operations of radio and landline cryptographic broadcast facilities and was assigned to a unit in Germany, where he served a full year and a half in tactical communication, serving during the Russian invasion of Czechoslavkia. In 1969, Mr. Lynch was transferred to Pleiku, Republic of Vietman, where he served with distinction, earning the Army Commendation Medal for good service and an Oak Leaf Cluster for heroism, and the Vietman Combat Medal with three campaign stars, awarded for his participation in the siege of Dak To/Ben Het, the Tet II invasion and the Cambodian incursions. Mr. Lynch was honorably discharged in 1970, whereupon he moved back to Queensbury and attended the local college for one year, before being acccepted in a specialized journalism management program at Ithaca College. He has been involved in broadcasting since he was twelve

years old, observing station operations at Normandy's Glens Falls Stations, FM Station (WYLR) and AM Station (WWSC). He obtained his third-class broadcasting license when he was sixteen.

- 3. Upon Mr. Lynch's return from Vietnam prior to September, 1971, he worked temporarily at the Stations for a number of weeks during his father's absence. Mr. Lynch assumed full-time management of Stations WWSC and WYLR in September, 1971, and has been Normandy's Chief Executive Officer and the General Manager of the Stations since that date. After the death of his father in 1972 and his mother in 1975, Mr. Lynch assumed an ownership interest in Normandy, and he acquired 100 percent ownership of Normandy in 1984.
- 4. Mr. Lynch has been responsible for day-to-day operation of both Stations, overseeing all station operations, including, programming, sales, community relations, employment relations, public service programming and relations with advertisers and the general public. He supervises a staff of 25-30 full and part-time employees, including a sales manager and sales persons, a program director and on-air personnel, a news director and news reporters, a chief engineer and clerical personnel. Mr. Lynch works well in excess of 40 hours a week for Normandy.
- 5. Throughout his life, Mr. Lynch has been active in his community. Before joining Normandy, he participated in cub scouts and boy scouts. He served in three churches as an altar boy and was a Red Cross water safety instructor. He was also a member of the YMCA and the Vietnam Veterans Against the War. After he assumed his responsibilities at Normandy, Mr. Lynch continued to participate in community activities, apart from his broadcasting duties and interests. From 1981 to 1986, Mr. Lynch served as a board member of the local chapter of the Vietnam Veterans of America (Chapter 79), where he also chaired committees on Agent Orange and Post-Traumatic Stress. Mr. Lynch represented this group on the State Board and was one of two members chosen as a delegate to the group's founding convention in Washington, D.C. when the Vietnam Memorial Wall was dedicated. After Mr. Lynch helped get the Adirondack Balloon Festival started (the largest spectator event in the area), Mr. Lynch joined in as a personal activity. He now owns a balloon and participates in the

Festival and other ballooning events. Throughout the 1980's, in addition to the help that Normandy gave the Tri-County (Warren, Washington and Saratoga Counties) Taxpayers Association (an environmental/taxpayers group) and the Tri-County Heart Association, Mr. Lynch also became personally involved independently of his broadcast duties. He served as Chairman of the Board of the American Heart Association from 1975 to 1978 and also served on the Executive Committee of its eleven-county affiliate, spending in excess of 200 hours some years in those activities. Mr. Lynch personally has also been a friend and supporter of the Taxpayers Association throughout the 1980's.

- 6. In addition to Mr. Lynch's personal community activities, he has put the Normandy stations at the service of a wide variety of community organizations. A narrative summary of some of those activities is attached as Annex A.
- 7. Letters and/or awards attesting to Mr. Lynch's integration are attached as Annex B.
- 8. Documents attesting to Mr. Lynch's honorable voluntary service in the U.S. Army are attached as Annex C, along with Mr. Lynch's local voting record.
- 9. Following receipt of his renewal, Mr. Lynch will continue to devote forty or more hours a week running stations WYLR and WWSC.

ANNEX A

ANNEX A

For each of the past three years (1987, 1988, and 1989)., Normandy Station WWSC has been one of only 50 finalists for the Crystal Award from the National Association of Broadcasters. Normandy Station WYLR has been a finalist for the Crystal Award in 1988 and 1989. The award is open to 10,000 broadcasters in the United States and rewards broadcasters for outstanding community involvement. When the Lake George Winter Carnival, the area's largest winter event, was floundering, Mr. Lynch helped revitalize the festival, working long hours with the carnival board. Mr. Lynch served on the Board of Directors of Planned Parenthood. For his efforts on behalf of the Lower Adirondack Regional Arts Council, Mr. Lynch was awarded one of the Council's first honorary life membership.

Mr. Lynch has put Normandy at the service of a large variety of community organizations. WYLR broadcast from the site of the Adirondack Balloon Festival and promoted the Festival every year since its founding. The first year that professional hockey came to Queensbury/Glens Falls, Normandy became the first radio station to broadcast hockey in Glens Falls. Normandy has also broadcast the local professional baseball games over the life of the team in Queensbury/Glens Falls. Normandy also broadcast as the official stations of the largest convention in the region, the American Motorcycle Convention. Normandy has also participated in fundraising for the new YMCA building, helped to establish, fundraise and publicize the Chapman Historical Museum, and publicized and helped to fundraise for a multimillion dollar expansion of the Hyde Collection (art museum). Normandy and Mr. Lynch have worked over the years with the Glens Falls Symphony Orchestra, the Lake George Arts Project, and cosponsored (with the Glens Falls Police Benevolent Association) children's concerts and numerous other cultural events. When Warren County experienced the highest incidence of heart deaths in the nation, Normandy helped raise tens of thousands of dollars with 24hour long heart radiothons, bought a 30-foot camper and stocked it with EKG machines, blood pressure equipment, blood sugar testing, vital capacity monitors, and then managed an educational and testing

program. As a consequence of these community efforts, the precentage of heart deaths has declined over the years. Normandy has helped raise literally hundreds of thousands of dollars for the poor around Christmas. Through the Giant Garage Sales of WWSC and WYLR working over a decade with "Operation Santa Claus" thousands of children have had food on the table and toys under the tree at Christmas. helped institute and publicize municipal vans to take poorer veterans to the Albany Veterans Administration Center. It promoted numerous programs for the elderly. It sought information on and ran programs and public service announcements educating its listeners on numerous types of state and federal aid for the underprivileged, from Food Stamps and Vets benefits to Social Security and aid to mothers with dependent children. Normandy has supported Cerebral Palsy Walkathons for almost 20 years, Girl Scout Cookies for almost 10 years, Muscular Dystrophy Sports Tournaments, church barbecues, civic group events, For his efforts on behalf of the Lions Club, including cosponsoring for many years the Lions' Drum Corps International Competition (which has raised almost \$100,000 for sight projects for the needy), Mr. Lynch was made an Honorary Lion.

ANNEX B

AFFIDAVIT OF FRANCIS X. O'KEFFE

STATE OF NEW YORK)	
)	ss.:
COUNTY OF WARREN)	

I, Francis X. O'Keefe, being duly sworn, state as follows:

- 1. My name is Francis X. O'Keefe. I am the Mayor of Glens Falls, New York. I was elected to my first term as Mayor in November, 1985, and re-elected to a second four-year term last November. Glens Falls- "Hometown, U.S.A."- is a dynamic, thriving small city. I am proud to have played a part in the success, growth and excellent "quality of life" enjoyed by our fine community.
- 2. I have known Mr. Christopher P. Lynch, President of Normandy Broadcasting (WWSC/WYLR-FM) for 15 years. In the course of my association with him, I have come to admire his qualities of absolute honesty, outstanding leadership and sound judgement. The position of respect and confidence which Mr. Lynch holds in the City of Glens Falls has been well earned.
- 3. Mr. Lynch's radio stations have played integral roles in our community's success. WWSC and WYLR-FM have been long-time leaders in our City's affairs. Mr. Lynch has imbued his radio stations with a working philosophy of social responsibility. In his altruistic manner, Mr. Lynch has always been willing to take the initiative in promoting community events, special causes and civic projects. Mr. Lynch never fails to give the full support of his radio stations to important community causes; more often than not, Mr. Lynch and the staff of WWSC and WYLR-FM have given their time and energy without desire for recognition or personal and moneyary gain.
- 4. The success of the City of Glens Falls' annual Holiday Festival, a recent promotion to help return professional baseball to Glens Falls, our entire 1989 City Sesquicentennial Celebration, the annual Fort Edward Lions Club "Drum and Bugle Corps Show" (to benefit Lions Club projects) held at Fast Field in Glens Falls, the annual Adirondack Balloon Festival, the Lower Adirondack Regional Arts Council Summer Festival and many other events, would have been impossible without Mr. Lynch's help. In some way— whether through public affairs coverage, public service announcements, promotion and advertising, special event coverage, co-sponsorship or direct financial underwriting— WWSC and WYLR-FM always manages to help our community.
- 5. Mr. Lynch INVESTS in the City of Glens falls because he firmly believes that it is far better to give than to receive. His radio stations operate for the public good; I am very proud of the long-standing record of distinguished service achieved by Normandy Broadcasting.

Mayor Francis X. O'Kecfe

Subscribed and sworn to before me this

Af day of Septomber, 1990

Notary Public

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ATTACHMENT 1

STATE OF NEW YORK)
) ss.:
COUNTY OF WARREN)

AFFIDAVIT OF EDWARD M. BARTHOLOMEW, JR.

- I, EDWARD M. BARTHOLOMEW, JR., being duly sworn, deposes and states the following:
- 1. I was mayor of the City of Glens Falls from 1978 through 1985.
- 2. I have been a practicing attorney in the State of New York since 1975.
- 3. I have been a resident of the Glens Falls/Queensbury area for nearly 40 years.
- 4. I can state unequivocally and without fear of contradiction that Chris Lynch and Normandy Broadcasting have contributed more to public affairs and broadcasting in the tricounty region than all the other area radio stations collectively.
- 5. In addition to providing local news casts seven days a week (the only station in the tri-county area to do so) Normandy Broadcasting has maintained a public affairs call-in talk program for many years.
- 6. Additionally, Normandy Broadcasting has not been reluctant to take a public position regarding issues of regional concern through broadcast editorials.

STAFFORD &
BARTHOLOMEW
ATTORNEYS AT LAW
IE BROAD STREET PLAZA
NE PALLE, NEW YORE 1886

- 7. Chris Lynch and Normandy Broadcasting have gone beyond the traditional areas of serving the public by instituting several public events each year to benefit scholarships to the youth of our community.
- 8. The station has actively participated with other organizations in a multitude of activities, such as the United Cerebral Palsy telethon, bloodmobiles and funding for volunteer fire companies.
- 9. Normandy Broadcasting has undertaken broadcasting of local sporting events for many years.
- 10. The majority of their programming has been and continues to be of local origination.
- 11. I have found Chris Lynch and Normandy Broadcasting to possess integrity and high standards, and undertake full and complete responsibility to our community.

Edward M. Bartholomew, Jr.

Sworn to before me this 27th day of September, 1990.

SIZANNE APPLEYARD Notary Public, State of New York Warren County Reg. No. 4946219 My Comm. Expires January 27, [CA1]

Exh. 3/11

AFFIDAVIT OF STEPHEN BORGOS

STATE OF NEW YORK)	\$ \$.;
COUNTY OF WARREN	j	

- I, Stephen Borgos, being duly sworn state as follows:
- l. I have been requested to prepare this letter to discuss in some detail the reputation of both Mr. Lynch and radio station WWSC in this community. I am pleased to prepare such a letter.
- 2. Shortly after my family moved to South Glens Falls in 1947 I became familiar with the call letters of WWSC. In fact, I can remember clearly that those letters appeared on the front of a broadcast booth at the Little League baseball filed behind the Glens Falls High School. Since that time, the call letters WWSC have continued to be part of my everyday life in this community.
- 3. Prior to beginning service in my new position as Town Supervisor almost three years ago, I was a member of the faculty and Professor of Business at Adirondack Community College for over 20 years. I have also served for more than 30 years as a volunteer firefighter in this community and have also had extensive personal involvement in the Little League baseball, the PTSA, and many other community organizations. In each and every one of these capacities I observed the outstanding cooperation of radio station WWSC and its owner Christopher Lynch in terms of community service.
- 4. WWSC has always coverd community emergencies in an extremely professional manner. As recently as last November when a tremendous wind storm destroyed hundreds of trees in our area causing significant power outages and damaging many homes, WWSC was there to help. I remained in cellular telephone $+\omega^{\gamma_L \gamma_L}$ contact with the newsroom at WWSC. At my request they would regularly broadcast updates to the community to let them know the status of the emergency.
- 5. At the very beginning of the Adirondack Balloon Festival during October of 1973, WWSC was there on the scene broadcasting live coverage. That coverage has continued through the recently completed 18th annual μ WYLR Adirondack Balloon Festival and has been a true community service.
- 6. WWSC has been at the location of the Lower Adirondack Regional Arts Council festival in the park, they have for many years provided a radio talk show called "Speak Up" permitting unlimited access by the public to discuss a wide variety of issues and many times have provided an "Open Line" which permits people to talk about any subject they would like for as long as they would like. In addition to all of this, WWSC has routinely covered Town

Board, Planning Board and Zoning Board of Appeals meetings. The Queensbury Town Board in the past three years has conducted more than 150 meetings and it's a fair estimate to say that WWSC has been there for at least 120 of those.

- 7. Many of times I have spoken with WWSC to request assistance in communicating with the public, to request their support in a service organization project, or just to discuss ideas with them. They have always been available to help. In terms of professional reputation and community generosity, WWSC and Christopher Lynch must both be listed as exceptional.
- 8. I will be please to provide additional detailed information to any person at any time. Please feel free to call me at my office, 518 792-5832.

Stephen Borgos
Supervisor Town of Queensbury

Subscribed and sworn to before me this 28th day of September, 1990

Janela a. Martin Notary Public

PAMELA A. MARTIN
Notary Public, State of New York
Warren County Reg. No. 4946222
My Comm. Expires January 27, 4244

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ATTACHMENT 4

AFFIDAVIT	OF	BILL	COLLINS

STATE OF NEW YORK

Ss.:

COUNTY OF WARREN

I, Bill Collins, being duly sworn, state as follows:

- 1. Over 18 years that I have been doing business in Hudson Falls, I have done business with WWSC and have known Chris Lynch. One of the main reasons I have continued my association with WWSC is Chris Lynch. I was always assured that my business dealing would be fair and honest. I was sure that throughout the years of my association with Mr. Lynch and his staff that if there was something to be done in the community he (they) would dig in, roll up their sleeves and contribute his (their) efforts. In my estimation the community is far better off because of the many efforts of Mr. Lynch and his staff. Many community volunteer, service organizations have benefitted continuously throughout the years. Certainly WWSC is and has been involved in many community events (many of these involvements were not commercially or financially sponsored) they were involved because they (he) knew they (he) should be.
- 2. I personally have been involved with organizations such as, Chamber of Commerce, Bloodmobiles, Rotary, Lung Associations, community events, and I have witnessed the results of Mr. Lynch's efforts.
- 3. In closing, I'm pleased to be associated with Mr. Lynch over those 18 years because I appreciated all the efforts of Mr. Lynch and the knowledge that when something has to be done, I could go to Mr. Lynch and have fair negotiations and honest efforts and get things done for the betterment of the whole community.

Bill Collins

President R.H. Pender, Inc.

Wally E. Mass.
Notary Public

September 26, 1990

To Whom It May Concern,

In the past and present WWSC/Y96-FM and Christopher P. Lynch have supported the endeavors of its listening community. As a chairman of the A.H.A. Heartmobile for 8 years, I had the pleasure of working with Chris and his staff. Live broadcasts and remotes brought brought health education into peoples lives. On one occasion a man listened to a nurse describe the symptoms of elevated blood pressure and came to the van to have his checked. His blood pressure was extremely high. He was hospitalized in Intensive Care and later underwent a kidney transplant. If I could remember his name, he'd tell you what that particular broadcast meant to him.

As a Girl Scout leader and area cookie chairman WWSC/Y96 has helped promote all of our cookie sales. This being the biggest fund raiser the Girl Scouts of America has, it is very important to the financial stability of our group to help defray the cost of our many programs.

As for WWSC/Y96 future, I'm sure Chris and his staff will continue to be accessible and supportive as they've always been in the past. They are a real attribute to our community.

A.Kyle Smith

Cd. Kyle Ameth LPN.

L.P.N.

September 27, 1990

WWSC 1450 AM Radio Station 217 Dix Avenue Glens Falls, NY 12801

To Whom It Concerns:

I have personal knowledge of the efforts of WWSC Radio Station in the area of Public Service. I served on the Cancer Society Board in the 60's and 70's. Public Service Announcements for all activities were always given. The pre-recorded P.S.A. from A.C.S. were run routinely during the fund raising month of April.

I also served on the American Heart Association Board in the 60's and 70's. The owner, Chris Lynch, served on the Board with me for at least 10 years - served in many roles. The one I remember most was his interest in providing the community with Blood Pressure Screening and Heart information. Out of this, the Heart Mobile grew. He and his employee's at WWSC worked like dogs with the American Heart Association to raise monies by having radiothons to buy a R.V. that was tailored into a screening van. I served as a volunteer and personally, I logged a lot of miles as a volunteer on the van. I can say, without question, we prevented many strokes and M.I.'s by picking up the hypertensive and referring to the doctors.

I also, in the 80's and 90's, have worked with the Local Diabetes Association. WWSC staff helped with a fund raiser in the mall called ARREST Diabetes. This fund raiser generated \$5,000 and enabled our group to have a van which went around screening for diabetes. The Heart Association was not doing their blood pressure screening at that time, so we also did blood pressures as part of our screening. we were independent, his staff helped us at different times to do P.S.A.'s and pre-recorded messages for use during November, which is National Diabetes Month and the time we are fund raising. Monthly, the P.S.A.'s related to our meetings, are faithfully announced and phone calls come sometimes when, in my writing, I have forgotten pieces of information---so the correct information is always given, which is more than can be said for our local newspaper.

WWSC - page 2

By now you know that I'm very high on what WWSC and Chris Lynch have done and I'm sure will continue to do for our communities. I say these things as a professional person, who is very involved helping people in our communities remain well. You cannot do this without support of the communication industry.

I salute the station for involvement, beyond the required public service, stated in the radio station's license.

Sincerely,

Bev Somerville, RN, BSN

Ber Somerville

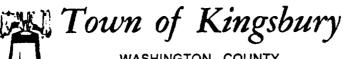
Certified Diabetic Educator

BS:dmm

Exh. 3/17

Supervisor: ROBERT J. CORRIGAN 747-2188

Town Council:
NORMAN W. HITCHCOCK
VINCENT M. DIETRICH
ROBERT L. WAITE
TERRY B. GOULD



WASHINGTON COUNTY

Kingsbury Town Hall

210 MAIN STREET

HUDSON FALLS, NEW YORK 12839

Town Clerk: HOLLY E. MABB 747-2188

Superintendent of Highways: RAYMOND H. BISSELL 747-6231

Town Attorney: RICHARD E. McLENITHAN 747-8236

September 26, 1990

To Whom It May Concern,

I'd like to take a few minutes of your time, to make you aware of how beneficial a roll WWSC/Christopher P. Lynch, has been to the Kingsbury Volunteer Recycling Committee. This station has given us countless hours of air time support. Without the access to the air waves of WWSC, our grass roots community effort would never have reached the 1200+ families that now participate.

Stephanie Monahan Kingsbury Recycling Coordinator

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